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January 25, 2021

Via ECF

The Honorable Loretta A. Preska,  
United States District for the Southern District of New York,  
500 Pearl Street,  
New York, NY 10007.

Re: *Petersen Energía Inversora S.A.U., et al. v. Argentine Republic and YPF S.A.*, No. 15 Civ. 2739 (LAP) ("*Petersen*"); *Eton Park Cap. Mgmt. et al. v. Argentine Republic and YPF S.A.*, No. 16 Civ. 8569 (LAP) ("*Eton Park*")

Dear Judge Preska:

Pursuant to Local Rule 5.2, Rule 2(H) of the Individual Practices of this Court, and Paragraph 13 of the stipulation and order governing the production and exchange of confidential materials in this action (*Petersen* ECF No. 177; *Eton Park* ECF No. 124 the "Protective Order"), Defendant the Argentine Republic ("the Republic"), together with Defendant YPF S.A. ("YPF"), which joins in this letter, respectfully move for an order granting leave to file under seal Defendants' enclosed January 25, 2021 Opposition to Plaintiffs' Categorical Assertion of Privilege Over All Communications with Burford Capital and Exhibits 2 and 11 thereto (the "Exhibits").

The Exhibits are excerpts of the transcripts of the October 29 deposition of Burford Capital CEO Christopher Bogart and the November 4 and 5 deposition of Petersen's Rule 30(b)(6) witness, Armando Betancor, that Plaintiffs have designated as confidential under the Protective Order. The Republic and YPF seek leave to file these transcripts under seal and to redact portions of their publicly-accessible Opposition that quote from the transcripts in light of Plaintiffs' designation.

Respectfully,

/s/ Thomas C. White

Thomas C. White

cc: Counsel of Record

Defendants' sealing request is granted on the ground that the sealed material contains confidential business information.

*Loretta A. Preska*

1/26/2021